



Park Region Telephone PO Box 277 100 Main St. Underwood, MN 56586 218-826-6161

Otter Tail Telcom 230 West Lincoln Ave. Fergus Falls, MN 56537 218-998-2000

Valley Telephone PO Box 277 Underwood, MN 56586 218-826-6161

# **February 2, 2006**

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: EB-06-TC-060, EB Docket No. 06-36 Certification of CPNI Filing 2006

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2006", as ordered in EB-06-TC-060.

Park Region Mutual Telephone Co. PO Box 277 100 Main St. Underwood, MN 56586

PO Box 277 100 Main St. Underwood, MN 56586 Otter Tail Telcom

Otter Com, Inc. PO Box 277 100 Main St. Underwood, MN 56586

Otter Tail Telcom
230 Lincoln Avenue West
Fergus Falls, MN 56537

Valley Telephone Company

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 et seq., as revised.

The attached Statement demonstrates such compliance.

Company Officer

Dated: 2-3-06

## Attachment

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington, DC 20554 Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Washington, DC 20554

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# Statement of Compliance Procedures for Customer Proprietary Network Information

- 1. Establishment of customer approval.
- Beginning in January 2003 and every other January thereafter, the attached opt-out notice, Exhibit A, will be included in customer newsletter.
- All new customers will be required to consent or reject to the use of their CPNI at the time of application for service. A written signature on the application serves as verification. The detailed opt-out notice, Exhibit A, will be mailed in new customer welcome packets as a further courtesy notice.
- 2. Training of company personnel.
- All customer service, retail sales and marketing personnel were trained regarding the purpose of CPNI and its requirements in January 2003. A refresher will be held every other January thereafter and the topic will also be included in orientation training materials for new hires in these positions. Failure of any staff member to seek approval and/or comply with CPNI guidelines will be subject to disciplinary action pursuant to Company Policy 3.005.
- 3. Maintenance of CPNI authorization records.
- Customer consent or rejection of CPNI use is flagged in the billing system customer master file.
- 4. Records of CPNI use or disclosure.
- Business Operations Manager must give prior approval for any sales/marketing campaigns which plan to utilize CPNI.
- Business Operations Manager shall be responsible to maintain records for any sales/marketing campaigns which utilize CPNI.
- Business Operation Manager shall be responsible to approve and maintain record of any instance where CPNI is disclosed to a 3<sup>rd</sup> party.
- Business Operations Manager shall be responsible for a review process of the compliance with CPNI rules in January of 2003 and every two years thereafter.

#### Exhibit A

## IMPORTANT NOTICE ABOUT YOUR ACCOUNT

Recent changes in federal law allow us to use information from your current records to market and advise you of new products and services that may satisfy your communications needs, unless you notify us otherwise.

## What is this "information"?

It is information – called "Customer Proprietary Network Information or "CPNI"- relating to the telecommunications services you currently are buying from us.

## How can we use this information?

This information can be used to advise you about innovative communications services or new communications technology and products. We **DO NOT** sell or in any way provide this information to any other company other than the 911 records we are required by law to provide if you are a telephone customer.

## Who will be able to use this information?

Only subsidiary companies of Park Region Telephone, which include Otter Tail Telcom, Otter Com and Valley Telephone Co.

## Will Park Region protect my information?

**YES!** You have the right, and we have the duty, under federal law, to protect the confidentiality of this information. Therefore, regardless of whether you consent or not to allowing us to continue providing you with marketing and educational mailings, your account information will be treated confidentially.

## What action is necessary on my part to show consent?

No action on your part is necessary. If you do not contact us with in 30 days and indicate that we may not use the information to continue providing you with marketing and educational mailings, we will continue to do so.

## What if I do not consent?

You can contact us using the contact information below and indicate that you are withdrawing your approval of our use of your CPNI. You will not receive company information from us at that point. You may miss the opportunity to learn of new, innovative service proposals, new packaging that could reduce your monthly bill, new lower rates on services such as long distance and other information that keeps you informed of the happenings of your local company.

## If I consent, can I change my mind?

Yes. You can contact us at any time. Until you do so, your consent is valid.

#### **Contact Information:**

From any phone receiving service from us call toll free: 611

Fergus Falls Office: 218-998-2000 or 888-716-8837 Underwood Office: 218-826-6161 or 800-247-2706

By e-mail: sales@parkregion.com